April 21, 1999 VPCD-99-05 (LDV/LDT/SM/HD)

SUBJECT: Request for Comparative Data for On-Road Light-Duty Vehicle, Light-Duty Trucks, and Heavy-Duty Engines

Dear Manufacturer:

We often get outside requests asking for "comparative" data for vehicles operating with and without alternative fuel. Frequently, these come from State and local agencies considering future fleet purchases. We are asking for your help in compiling some responsive data which can be made publicly available to such requesters. Specifically, we would like from exhaust emissions and fuel economy comparison data for on-road light-duty vehicles and light-duty trucks, and exhaust emissions only for heavy-duty engines for model years 1998, 1999 and 2000. Depending on the breadth of your alternative fuel product lines, three separate types of comparisons for each model year might be possible:

1. A direct comparison between the same manufacturer's dedicated conventional fuel vehicles/engines vs. dedicated alternatively fueled vehicles/engines. For example, a comparison between a gasoline-fueled Crown Vic and a dedicated CNG-fueled Crown Vic. If there is an engine family operating with a dedicated alternative fuel system for which there is no direct engine family comparison operating on a dedicated conventional fuel, chose the engine family that, in your judgment, would have the appropriate comparative data.

2. A direct comparison between the same manufacturer's flexible-fueled vehicles/engines vs. dedicated gasoline fueled vehicles/engines. This comparison would be for the vehicle operating on, for example M85, and straight gasoline. In addition to a comparison of the exhaust emissions and fuel economy data within the same flex-fuel engine family, a comparison to the closest engine family that is a dedicated gasoline engine family. If there is an engine family operating with a flexible-fuel system for which there is no direct comparison operating on a dedicated conventional fuel, chose the engine family that, in your judgment, would have the appropriate comparative data.

3. A direct comparison between the same manufacturer's dual-fueled vehicles / engines vs. dedicated gasoline fueled vehicles/engines. This comparison would be for each engine family as well as for similar vehicles/engines. If there is an engine family operating with a dual-fuel system for which there is no direct comparison operating on a dedicated

conventional fuel, choose the engine family that, in your judgment, would have the appropriate comparative data.

Some manufacturers have entered into agreements with outside conversion entities. Please include these engine families in the above comparison.

For Light-Duty vehicles and trucks include:

Model year, engine family, carline names, complying emission standard, exhaust emission data, evaporative emission data, fuel economy data, fuel type(s), Cold-CO data (when applicable), ETW, and Dyno HP.

For Heavy-Duty Engine Manufacturers include:

Model year, engine family, engine models, complying emission standard, exhaust emission data, evaporative emission data (when applicable), Maximum rated HP, Peak Torque, and smoke levels.

Often the above data will exist for more than one emission data vehicle/engine. List the data from each emission data vehicle/engine and the average of the data.

Once we organize the data, we will share it with you for accuracy. We will then post the final report on the EPA web page and provide each of you with a courtesy copy. We prefer that you submit the data electronically. Our target dates are for first compilation of data to be complete by May 7, 1999, returned to the respective manufacturers by May 21, 1999, and the complete data set available by May 28, 1999.

If you have questions regarding this request, please contact Mr. Clifford Tyree of my staff. He can be reached at 734-214-4310 phone, 734-214-4053 fax, and E-mail at tyree.clifford@epamail.epa.gov"

Sincerely,

Jane Armstrong, Director
Vehicle Program and Compliance Division
Office of Mobile Sources